## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE COMPANY, et al.,	·) ) )
Plaintiffs,	, )
VS.	) Civil Action No. 05-11150-DPW Hon. Judge Douglas P. Woodlock
ABBOTT LABORATORIES,	)
Defendant.	) ) )

## MOTION FOR ADMISSION PRO HAC VICE OF OZGE GUZELSU

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby moves that Ozge Guzelsu of Munger, Tolles & Olson LLP, 355 South Grand Avenue, 35th Floor, Los Angeles, California, 90071-1560, be admitted to appear on behalf of defendant Abbott Laboratories, and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

- 1. Ms. Guzelsu is and has been a member in good standing of the bars of the following states since the following dates:
  - State of California (January 7, 2003, with inactive status from 1/1/2004 through 11/29/2004)
- 2. Ms. Guzelsu is and has been a member in good standing of the bars of the following United States District Courts, and Circuit Courts of Appeals since the following dates:

Ninth Circuit Court of Appeals (December 13, 2004)

- 3. There are no disciplinary proceedings pending against Ms. Guzelsu as a member of the bar in any jurisdiction;
- 4. Ms. Guzelsu has represented to the undersigned counsel that she is familiar with the Local Rules of the United States District Court for the District of Massachusetts; and
- 5. In further support of this motion, Ms. Guzelsu has submitted herewith her Certificate of Good Standing as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves Ms. Guzelsu's admission to practice before this Court pro hac vice.

Respectfully submitted,

/s/ Michael S. D'Orsi

Peter E. Gelhaar (BBO #188310) Michael S. D'Orsi (BBO #566960) DONNELLY, CONROY & GELHAAR, LLP One Beacon Street, 33d Floor Boston, MA 02108 (617) 720-2880 peg@dcglaw.com msd@dcglaw.com

Dated: September 26, 2006

**CERTIFICATE OF GOOD STANDING** 

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Ozge Guzelsu, Esq., hereby certify that: (1) I am admitted to the bars of the Courts set forth in the foregoing motion; (2) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice; (3) No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Respectfully submitted,

/s/ Ozge Guzelsu
Ozge Guzelsu, Esq.

Dated: September 26, 2006

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)** 

The undersigned hereby certifies that counsel for Abbott Laboratories has conferred with

counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance

Company, and ManuLife Insurance Company ("John Hancock") and John Hancock does not

oppose this Motion.

/s/ Michael S. D'Orsi
Michael S. D'Orsi

Dated: September 26, 2006

**CERTIFICATE OF SERVICE** 

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 26, 2006.

/s/ Michael S. D'Orsi
Michael S. D'Orsi

Dated: September 26, 2006